

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In Re:)	Case No. 10-50494
)	
Fair Finance Company)	Judge Marilyn Shea-Stonum
)	
)	<u>APPLICATION TO EMPLOY</u>
Debtor.)	<u>COUNSEL FOR THE ESTATE</u>
)	

Brian A. Bash, Trustee, respectfully represents to the Court

1. That he is the duly appointed, qualified and acting interim trustee in the within proceedings and that he is a member of the law firm of Baker & Hostetler LLP.
2. There are assets belonging to the within Estate, which must be administered and disposed of by the Trustee. The Trustee requires legal counsel in order to prepare, file and litigate pleadings required to effect the turnover and liquidation of said assets.
3. It is necessary that he employ counsel to render services consisting of the following:
 - (a) Preparation, execution and filing of pleadings, attendance at hearings for the liquidation of property and/or other services incidental thereto, including prosecution of appropriate adversary proceedings;
 - (b) Preparation of pleadings, motions, objections and applications incidental to the administration;
 - (c) Intervening in, or commencing upon proper application, in state or federal court, proceedings necessary for the proper administration of the estate; and
 - (d) Resisting and opposing applications for reclamation and requested exemptions of the Debtor(s).
4. The Trustee requests the appointment of Baker & Hostetler LLP because of the efficiencies of such appointment would be in the best interests of the estate.
5. The members of the Trustee's law firm are attorneys duly admitted to practice in the U.S. District Court in this District and are particularly qualified to act in the premises, having knowledge of bankruptcy practice.

WHEREFORE, the Trustee prays for authority to employ his law firm of Baker & Hostetler LLP to act as his attorney in this case.

Respectfully submitted,

/s/ Brian A. Bash

Brian A. Bash, Trustee (0000134)
Baker & Hostetler LLP
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In Re:) Case No. 10-50494
)
Fair Finance Company) Judge Marilyn Shea-Stonum
)
Debtor.) **AFFIDAVIT AND VERIFIED STATEMENT**
) **PURSUANT TO RULES 5002, 2014, AND**
) **2016 OF THE BANKRUPTCY RULES**
)

The undersigned being first duly sworn and according to law, deposes and says that:

1. He makes this Verified Statement pursuant to the provisions of 11 U.S.C. Sections 327(a) and (c) of the Bankruptcy Code regarding employment of professional persons by the Trustee, and in light of the restrictions and requirements imposed thereon by Bankruptcy Rules 2014(a), 2016(b) and 5002.

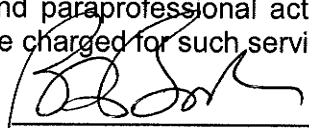
2. This verified Statement supplements disclosures contained in and accompanying the Application to Employ Counsel for the Estate filed with this Court.

3. This Verified Statement is to affirm to this Court that neither Affiant nor any person with whom he is associated in the practice of law is a relative by blood or marriage of any Bankruptcy Judge of the Northern District of Ohio or the United States Trustee for Region 9, and that he is not now nor has he ever been so connected with any such Judge or the United States Trustee for Region 9 as to render his appointment or the Court's approval of such employment as counsel in the above-captioned matter improper except that Brian A. Bash, a partner, is on the private panel of trustees for this District and Pamela Johnson, a partner, is on the private panel of trustees for Region 7.

4. This Verified Statement is to further affirm to this Court that neither Affiant, nor any person with whom he is associated in the practice of law, is connected with the debtor, creditors or any other party in interest or their respective attorneys and accountants.

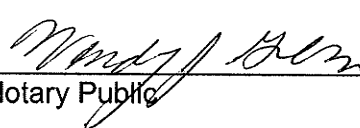
5. This Verified Statement is to fully disclose to the Court that to the best of his knowledge he knows of no matters that might be considered by any party to create any issue or claim of conflict or lack of being a disinterested party, as related to him or his law firm acting as counsel in this case and has no connections as relates to the debtor, creditors, or any person in interest, their respective attorneys and accountants and to disclose to the Court that the only fees and expenses to be paid to Applicant shall be those allowed pursuant to order of this Court, with none of such fees or expenses to be shared with third parties other than the members and associates of Applicant's law firm.

6. Further, this Verified Statement is to fully disclose to the Court that Baker & Hostetler will charge its standard hourly rates for work of this nature. Presently, the hourly rates range from \$200 to \$500 for partners and of-counsel, \$140 to \$330 for associates and \$75 to \$195 for legal assistants and support staff. The lawyer primarily responsible for this case will be Kelly S. Burgan, a partner with an hourly rate of \$400. The hourly rates set forth above are subject to periodic increases in the normal course of the Firm's business. The Firm will seek compensation for the services of each attorney and paraprofessional acting on behalf of the Trustee in this case at the then-current standard rate charged for such services.



Brian A. Bash, Partner (0000134)
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3200 National City Center
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Cleveland, OH 44114-3485
216.861.7581

SWORN TO BEFORE ME, and subscribed in my presence, this 22nd day of February, 2010.



Notary Public

WENDY J. GIBSON, Attorney
NOTARY PUBLIC - STATE OF OHIO
My commission has no expiration date.
Section 147.03 B, C

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application was electronically served on the Office of the U.S. Trustee.

/s/Brian A. Bash

Brian A. Bash, Trustee